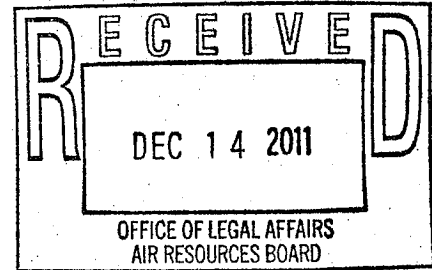


2211 Norfolk Street, Suite 614
Houston, Texas 77098
P 713 337 8800
F 866 273 8998
www.consumerenergyalliance.org

December 9, 2011

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814



RE: Comments on the Consideration of Amendments to the Low Carbon Fuel Standard

Dear Clerk of the California Air Resources Board:

Please accept the enclosed comments on the proposed amendments to California's low-carbon fuel standard. These comments have been submitted to Consumer Energy Alliance by consumer-advocates, a vast a majority of whom reside in California. We are pleased to submit them on their behalf.

In total, you will find **63** letters.

If you have any questions on these comments, their signatories, or any other matter, please contact me at mwhatley@consumerenergyalliance.org, or contact my colleague, Natalie Joubert, at njoubert@consumerenergyalliance.org.

I appreciate the opportunity to comment on this important matter.

Thank you,

Michael Whatley
Executive Vice President

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Proposed Amendments to the Low-Carbon Fuel Standard Regulation

Dear Air Resources Board:

As you consider revisions to the California Low-Carbon Fuel Standard (LCFS), I would strongly urge you to drop the program all together. An LCFS is a misguided fuel program that will do little – if anything – to protect our environment, but will go a long way to destroying our state's economy.

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In closing, I strongly urge the ARB to discontinue the LCFS. These Regulations will cause undue harm to California's economy and jeopardize our energy security.

Sincerely,

ERIC BOTTERMAN
442 FST APT. AA-5
CHULA VISTA, California 91910

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Brownie Davis
10970 Belgian St
San Diego, California 92126

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Trudy Aznar
1516/S/Sierra Vista
Fresno, California 93702

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Deanna Sylva
198 View Crest Dr
Oroville, California 95966

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Victoria Coots
1555 3rd Avenue
Oroville, California 95965

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Christopher Peltack Sr.
P.O. Box 606
Desert Center, California 92239

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Melvin Tracy
PO Box 221
Chula Vista, California 91912

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Luis Guzman
1109 Glendon Way
South Pasadena, California 91030

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

David Dunham
721 Hermosa Way
Oxnard, California 93036

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Dean Doglietto
8341 Holly dr
Citrus Heights, California 95610

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Sincerely,

Jim Seippel
4063 Via Encinas
Cypress, California 90630

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In closing, I strongly urge the ARB to discontinue the LCFS. These Regulations will cause undue harm to California's economy and jeopardize our energy security.

Sincerely,

Beverlie Cavener
308 Seattle
Dorris, California 96023

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

wendy Henning
246 Belmont Ave.
Long Beach, California 90803

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Dennis Keith
14736 Live Oak St.
Hesperia, California 92345

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Terry Burke
Bailhache Ave
Healdsburg, California 95448

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Janice Erler
po box 1578
Valley Center, California 92082

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Darrin Rehn
1057 Fassler Ave
Pacifica, California 94044

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Clinton hufferd
13440 lakewood bl #53
BELLFLOWER, California 90706

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Randolph Faver II
1430 Carey Ave.
Brea, California 92821

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

George Day
10827 Coloma Road #4
Rancho Cordova, California 95670

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Lawrence Stice
14651 Taft Street
Garden Grove, California 92843

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

charles rouse
1408 jamacha rd
el cajon, California 92019

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

David Hester
4878 Leonard RD
Mariposa, California 95338

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Dorene Brink
1854 Muncie Ct
El Cajon, California 92019

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Proposed Amendments to the Low-Carbon Fuel Standard Regulation

Dear Air Resources Board:

As you consider revisions to the California Low-Carbon Fuel Standard (LCFS), I would strongly urge you to drop the program all together. An LCFS is a misguided fuel program that will do little – if anything – to protect our environment, but will go a long way to destroying our state's economy.

At its core, the LCFS program will require fuel providers in California to ration traditional fuels such as gasoline and diesel and replace them with low-carbon fuels. Unfortunately, low-carbon fuels, such as cellulosic ethanol, are not commercially available today, despite the presence of a federal renewable fuel standard (RFS) program that encourages their development. In fact, even with a federal RFS, the U.S. Environmental Protection Agency's records show that there have been zero gallons of cellulosic ethanol produced and commercially available in 2010 and 2011, and the EPA projects that only 3.5 million gallons will be available nationally next year. The market is similarly bleak when it comes to sales of alternatively fueled vehicles: the U.S. Department of Energy projects that less than 20,000 battery electric and plug-in hybrid electric vehicles will be sold nationwide over the next decade – far fewer than the numbers necessary to meet the carbon reduction .

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Finally, the California LCFS discriminates against Canadian oil imports. Canada is the United States' largest trading partner and accounts for about 20 percent of U.S. oil imports. Oil imports from our democratic, friendly neighbor help boost our nation's energy security and are substantially discounted against world oil prices. The High Carbon Intensity Crude Oil designation is specifically designed to penalize the importation of crude oil slates that are higher in carbon intensity, but does not penalize the use of high-carbon crudes that are produced in California – a clear violation of the Constitution.

In closing, I strongly urge the ARB to discontinue the LCFS. These Regulations will cause undue harm to California's economy and jeopardize our energy security.

Sincerely,

Charles O'Connell, PE, F.ASCE
25018 Smokewood Way
Stevenson Ranch, California 91381

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Ernest Walker Jr.
po box 317
Coarsegold, California 93614

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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PLEASE GIVE ADEQUATE CONSIDERATION TO THE CITIZENS OF OUR STATE, RATHER THAN MERE POLITICAL MANEUVERING.

WE CANNOT AFFORD MORE POLITICAL NONSENSE--THAT IS THE CAUSE OF OUR PRESENT NEAR-BANKRUPTCY.

SACRAMENTO POLITICIANS HAVE MADE CALIFORNIA A JOKE IN THE OTHER 49 STATES! WE'VE
BECOME THE POSTER CHILD FOR BAD GOVERNMENT.

DON'T YOU THINK IT'S TIME TO GET OFF THAT ROAD??

Sincerely,

elizabeth houghton
6222 rosemary drive
cypress, California 90630

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Louis Pontarelli
25290 Lisa Marie Circle
TEMECULA, California 92590

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Sharon Soto
6211 Lk. Alturas Ave.
San Diego, California 92119

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Stephanie Staker
935 Buckskin Terrace
Brentwood, California 94513

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Eric Schaller
135-A W Glaucus St
Encinitas, California 92024

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Roger Frid
3529 Allan Adale Ct
Modesto, California 95355

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Larry Braley
677 Sonore Ave
Manteca, California 95337

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Melvin Curtis
664-A Freeman Ln
Grass Valley, California 95949

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P.O. Box 2815
Sacramento, CA 95812

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Greg Waggy
7402 Carondelet Ln
Sacramento, California 95828

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Sacramento, CA 95812

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Sincerely,

Linda Morero
24870 W Rancho Vista Dr
Buckeye, Arizona 85326

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Sacramento, CA 95812

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In closing, I strongly urge the ARB to discontinue the LCFS. These Regulations will cause undue harm to California's economy and jeopardize our energy security.

Sincerely,

Erich Kern
24774 Shoshonee Dr.
Murrieta, California 92562

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Aurelio Gonzales
P.O. Box 62
Atwater, California 95301

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Yvette Treat
9228 Sheep ranch Road
Mountain Ranch, California 95246

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Randy Freeland
2967 Kern River Canyon Road
Bodfish, California 93205

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Cindy Jones
5311 Old Cypress Springs Rd.
Hope Mills, North Carolina 28348

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

nicholas hansen
5320 zelah ave 211
encino, California 91316

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Frederic Soliman
5063 Highland View Avenue
Los Angeles, California 90041

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Reginald Driscoll
1224 St. Elizabeth Ct.
Concord, California 94518

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Daniela Carnevale
42 primrose lane
kings park, New York 11754

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Assunta Carnevale
42 primrose lane
kings park, New York 11754

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P.O. Box 2815
Sacramento, CA 95812

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Dominick Carnevale
95-47-114 St S.Richmond Hill
Queens, New York 11419

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1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Ardee Mucha
6178 Oneida Dr
San Jose, California 95123

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1001 "I" Street
P.O. Box 2815
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Sincerely,

Steve Northup
2745 Fremontia Dr
San Bernardino, California 92404

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Proposed Amendments to the Low-Carbon Fuel Standard Regulation

Dear Air Resources Board:

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Sincerely,

Sharon Duchac
3517 Foothill Blvd
redding, California 96001

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

William Nohava
18006 Almond RD
Castro Valley, California 94546

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Leon Blondon
1211 Kenny Dr
Yuba City, California 95991

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Denis Quinn
1578 11th Avenue
San Francisco, California 94122

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Anees Mir
23209 Anza Avenue
Torrance, California 90505

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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I expect your support,

Mathew Driscoll
115 Tanya Way
Roseville, California 95661

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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In closing, I strongly urge the ARB to discontinue the LCFS. These Regulations will cause undue harm to California's economy and jeopardize our energy security. Due to the ARB California already has among the highest gas prices in the nation.

The ARB should be dissolved and CA should adopt the same national standards used by most of the other states. The myth of human-caused global warming is a well-documented scam. CO2 is not a pollutant that needs regulating, but an essential part the life cycle on earth.

Sincerely,

Edgar Swank
5515 Spinnaker Drive 4
San Jose, California 95123

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Gloria Barcojo
50 Lapham Way
San Francisco, California 94112

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Betty Richard
1391 W. Fairmont Ave, Apt A
Fresno, California 93705

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Sincerely,

Douglas Duvall
849 Sierra Vista Dr.
Wofford Heights, California 93285

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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SHARRON THAYER
10255 CARIOCA CT
SAN DIEGO, California 92124

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Shirley Cameron
5 Lucania Drive
Newport Coast, California 92657

California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

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Dear Air Resources Board:

As you consider revisions to the California Low-Carbon Fuel Standard (LCFS), I would strongly urge you to drop the program all together. An LCFS is a misguided fuel program that will do little – if anything – to protect our environment, but will go a long way to destroying our state's economy.

At its core, the LCFS program will require fuel providers in California to ration traditional fuels such as gasoline and diesel and replace them with low-carbon fuels. Unfortunately, low-carbon fuels, such as cellulosic ethanol, are not commercially available today, despite the presence of a federal renewable fuel standard (RFS) program that encourages their development. In fact, even with a federal RFS, the U.S. Environmental Protection Agency's records show that there have been zero gallons of cellulosic ethanol produced and commercially available in 2010 and 2011, and the EPA projects that only 3.5 million gallons will be available nationally next year. The market is similarly bleak when it comes to sales of alternatively fueled vehicles: the U.S. Department of Energy projects that less than 20,000 battery electric and plug-in hybrid electric vehicles will be sold nationwide over the next decade – far fewer than the numbers necessary to meet the carbon reduction .

Since these low-carbon transportation options will not be available at the quantities needed to support our economy, consumers across California will be forced to pay substantially higher fuel costs as the supply of traditional fuels will become rationed. According to a 2010 study by Charles River Associates, an LCFS similar to the California model would raise average U.S. gasoline and diesel prices by 170 percent within ten years. Such a dramatic spike in fuel costs will significantly harm California's economy. With unemployment hovering around 12 percent in California, we must pursue thoughtful policies that protect our fragile economy and avoid those policies that could cost thousands of jobs, such as an LCFS.

Finally, the California LCFS discriminates against Canadian oil imports. Canada is the United States' largest trading partner and accounts for about 20 percent of U.S. oil imports. Oil imports from our democratic, friendly neighbor help boost our nation's energy security and are substantially discounted against world oil prices. The High Carbon Intensity Crude Oil designation is specifically designed to penalize the importation of crude oil slates that are higher in carbon intensity, but does not penalize the use of high-carbon crudes that are produced in California – a clear violation of the Constitution.

In closing, I strongly urge the ARB to discontinue the LCFS. These Regulations will cause undue harm to California's economy and jeopardize our energy security.

Sincerely,

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